

ESTTA Tracking number: **ESTTA663986**

Filing date: **03/31/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|--|--|
| Proceeding. | 92060981 |
| Applicant | Defendant Sandra M Hewitt-Bell DBA Hewitt-Bell Wine Cellars |
| Other Party | Plaintiff Diageo North America, Inc. |
| Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)? | No |

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 04/20/2015. Sandra M Hewitt-Bell DBA Hewitt-Bell Wine Cellars requests that such date be extended for 30 days, or until 05/20/2015, and that all subsequent dates be reset accordingly.

| | |
|---|------------|
| Time to Answer : | 05/20/2015 |
| Deadline for Discovery Conference : | 06/19/2015 |
| Discovery Opens : | 06/19/2015 |
| Initial Disclosures Due : | 07/19/2015 |
| Expert Disclosure Due : | 11/16/2015 |
| Discovery Closes : | 12/16/2015 |
| Plaintiff's Pretrial Disclosures : | 01/30/2016 |
| Plaintiff's 30-day Trial Period Ends : | 03/15/2016 |
| Defendant's Pretrial Disclosures : | 03/30/2016 |
| Defendant's 30-day Trial Period Ends : | 05/14/2016 |
| Plaintiff's Rebuttal Disclosures : | 05/29/2016 |
| Plaintiff's 15-day Rebuttal Period Ends : | 06/28/2016 |

The grounds for this request are as follows:

- *The parties are actively engaged in negotiations for the settlement of this matter. The deadline to file and serve an answer in this Cancellation is currently set for 4/20/2015. Defendant Sandra M. Hewitt-Bell, d/b/a Hewitt-Bell Wine Cellars requests that this deadline be extended for thirty (30) days and that all subsequent dates be reset accordingly to allow the parties to continue their settlement efforts.*

Sandra M Hewitt-Bell DBA Hewitt-Bell Wine Cellars has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Sandra M Hewitt-Bell DBA Hewitt-Bell Wine Cellars has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Robert K. Walker/

Robert K. Walker

rwalker@donahue.com

progoff.susan@dorsey.com, ny.trademark@dorsey.com, osowski.kaydi@dorsey.com

03/31/2015